

Robert D. Lillienstein, Esq. (rlillienstein@mosessinger.com)  
Jordan Greenberger, Esq. (jgreenberger@mosessinger.com)  
MOSES & SINGER LLP  
*Attorneys for Defendants*  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
(212) 554-7800 (telephone)  
(212) 554-7700 (facsimile)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARTHUR ANGERMEIR, NITESH BHAGWANANI,  
KEN ELDER, BECKY D. GLYNN, RAJAT GOYAL,  
KRISTINA GREENE, LOUIS MARROU, MARILYN  
MURRELL, AND DR. SHIVA NANCY SHABNAM,

Plaintiffs,

– against –

JAY COHEN, SARA KRIEGER, JENNIFER CENTENO,  
LOUIS CUCINOTTA, RICARDO BROWN, ROBERT  
TAYLOR, JOSEPH I. SUSSMAN, JOSEPH I.  
SUSSMAN, P.C., LEASE FINANCE GROUP, LLC, MBF  
LEASING LLC and NORTHERN LEASING SYSTEMS,  
INC.,

Defendants.

12 Civ. 0055 (KBF)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the Court's Order, dated March 31, 2015 (ECF No. 98), the Court's order dated April 17, 2015 (ECF No. 124), and the Declaration of Robert Lillienstein, dated May 20, 2015 (with exhibits), the undersigned counsel for Defendants renews its motion before this Court (ECF No. 106), before the Honorable Katherine. B. Forrest, U.S.D.C. J., in Courtroom 15A at the United States Courthouse located at 500 Pearl St., New York, NY 10007, for and Order seeking the following relief as a result of Plaintiff Arthur Angermeir's failure to comply with numerous orders of this Court regarding discovery:

A. a judgment dismissing all claims asserted in this action by Plaintiff Arthur

Angermeir, with prejudice, together with costs and disbursements to Defendants;

B. a money judgment in favor of counterclaim-plaintiff MBF Leasing LLC and against Arthur Angermeir for \$3,680 plus interest from February 1, 2009 on MBF's counterclaim against Mr. Angermeir;

C. an inquest to calculate the attorneys' fees and expenses to which MBF is entitled under the contractual provision signed by Mr. Angermeir under which he agreed that he would be liable to Defendant MBF Leasing LLC ("MBF") for all reasonable attorney's fees and other expenses incurred in enforcing the guaranty and lease;

D. a money judgment in favor of the Defendant Northern Leasing Systems, Inc. and against Plaintiff Arthur Angermeir in the amount of \$4,446.52, representing the attorneys' fees incurred by Defendants in connection with Mr. Angermeir's failure to produce initial disclosures, in accordance with this Court's Order dated March 31, 2015 (ECF No. 98) imposing sanctions against Mr. Angermeir; and

E. such other and further relief as the Court deems just.

Dated: May 20, 2015  
New York, New York

/s/  
Robert D. Lillienstein, Esq.  
(rlillienstein@mosessinger.com)  
Jordan Greenberger, Esq.  
(jgreenberger@mosessinger.com)  
MOSES & SINGER LLP  
*Attorneys for Defendants*  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
(212) 554-7807 (telephone)  
(212) 206-4307 (facsimile)